

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANNE DE LACOUR, ANDREA WRIGHT, and
LOREE MORAN individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE CO., and TOM'S OF
MAINE INC.

Defendants.

Civil Action No. 1:16-CV-08364
(RA)

**DECLARATION OF ANDREA WRIGHT IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION, APPOINTMENT OF CLASS REPRESENTATIVES,
AND APPOINTMENT OF CLASS COUNSEL**

I, Andrea Wright, declare as follows:

1. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I am one of the representative plaintiffs in this class action. This Declaration is given in support of my request that the court certify this case as a class action, appoint Plaintiffs as class representatives, and appoint Bursor & Fisher, P.A. as class counsel.

3. I am a citizen of California who resides in La Quinta, California.

4. I regularly purchased Tom's of Maine brand deodorants at Target and Trader Joe's in and near La Quinta, California. While shopping, I was specifically interested in purchasing a natural deodorant.

5. I purchased Tom's of Maine products based on claims on the products' labels that the products were "natural." By reading the representations on the product labels, I understood

that I was purchasing natural deodorants. I purchased Tom's of Maine products expecting that the products were natural and did not contain synthetic or chemically processed ingredients. I would not have purchased Tom's of Maine products if the labels had not stated the Products were "natural." I would not have purchased Tom's of Maine products if I had known the products contained ingredients that were not in fact natural.

6. I am aware of my duties as a class representative, and do not believe there is any reason why I would not be able to represent that class. I am willing and able to testify at a deposition and trial.

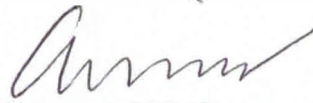
7. I have consulted with my counsel periodically to review, discuss, and determine the actions to be taken and decisions to be made in pursuit of this case on behalf of all class members. I have reviewed and commented on pleadings, responded to extensive written discovery requests, reviewed and verified detailed responses to interrogatories and requests for admission, and maintain frequent contact with counsel regarding the status of the case. Based on these interactions and my relationship with my counsel, I believe my counsel has fairly and adequately represented the Class and will continue to do so.

8. I understand that, as a class representative, I have an obligation to assert and protect the interests of other class members and not act just for my own personal benefit. I do not have any conflict with other class members. I will do my best to protect the interests of other class members and will fairly and adequately represent the class to the best of my ability.

9. It is my understanding that Defendants sold me the same Tom's of Maine products as they did other class members. I therefore request that the court certify a class of all persons in the United States who purchased Tom's of Maine deodorant and/or toothpaste products on or after

September 24, 2015, as well as a subclass of Class members who purchased Tom's of Maine products in California.

10. I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct. Executed on June 15, 2018 at La Quinta, California.

A handwritten signature in cursive script, appearing to read 'Andrea Wright', written in dark ink.

Andrea Wright